

RECEIVED

DEC 13 2012 USM:2013 FROM 24/DCC

AT 8:30 M
WILLIAM T. WALSH, CLERK

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 12- 815 (JAP)
:
: v. :
: 18 U.S.C. § 249(a)(1)
MICHAL GUNAR and : 18 U.S.C. § 371
CHRISTOPHER ISING : 18 U.S.C. § 2

INDICTMENT

The Grand Jury in and for the District of New Jersey,
sitting at Newark, charges:

COUNT ONE

(Conspiracy)

1. At all times relevant to this Indictment:

(a) Defendant MICHAL GUNAR was a resident of Cranbury, New Jersey and a member of the white supremacist organization known as the Aryan Terror Brigade ("ATB").

Defendant MICHAL GUNAR espoused white supremacist views in a variety of ways including, but not limited to, the use of an internet-based, social media website.

(b) Defendant CHRISTOPHER ISING was a resident of East Brunswick, New Jersey and a member of the white supremacist organization known as the Atlantic City Skins ("ACS"). Defendant CHRISTOPHER ISING espoused white supremacist views in a variety of ways including, but not limited to, the use of an internet-based, social media website. Defendant CHRISTOPHER ISING also

maintained numerous tattoos symbolizing white supremacist views on his person, including swastika tattoos on his arms and back.

(c) MH, MS and RM were young males of Egyptian descent who resided at an apartment complex in Sayreville, New Jersey ("the Apartment Complex").

The Conspiracy

2. From in or about December 2011, through on or about January 31, 2012, in Middlesex County, in the District of New Jersey and elsewhere, defendants

MICHAL GUNAR
and
CHRISTOPHER ISING

did knowingly and willfully conspire with each other and with others to commit an offense against the United States; that is, to willfully cause bodily injury to a person, specifically MH and RM, who are of Egyptian descent, because of the person's actual and perceived race, color, and national origin, contrary to 18 U.S.C. § 249(a)(1).

Manner and Means and Object of the Conspiracy

3. It was the object of the conspiracy to cause bodily injury to another person because of that individual's actual or perceived race, color, and national origin.

Overt Acts

4. In furtherance of the conspiracy, and to effect its unlawful object, defendants MICHAL GUNAR and CHRISTOPHER ISING committed and caused to be committed the following overt

acts on or about December 31, 2011, in the District of New Jersey:

(a) Defendant CHRISTOPHER ISING hosted a social gathering for ATB members and affiliates at his residence in East Brunswick, New Jersey, which was attended by defendant MICHAL GUNAR, among others.

(b) At the ATB social gathering, defendants MICHAL GUNAR and CHRISTOPHER ISING drank alcohol, listened to white supremacist music, and discussed plans to locate and assault non-Caucasian individuals.

(c) During the social gathering, defendants MICHAL GUNAR and CHRISTOPHER ISING, among others, departed the East Brunswick residence and drove to the Apartment Complex.

(d) Defendant MICHAL GUNAR possessed a knife as he proceeded to the Apartment Complex.

(e) Defendant CHRISTOPHER ISING possessed a pair of brass knuckles as he proceeded to the Apartment Complex.

(f) Upon their arrival at the Apartment Complex, defendants MICHAL GUNAR and CHRISTOPHER ISING searched for non-Caucasian individuals, and ultimately located and confronted MH, MS and RM.

(g) Defendant MICHAL GUNAR confronted MH in the Apartment Complex parking lot.

(h) Defendant MICHAL GUNAR forced MH away from a vehicle and physically assaulted MH by punching him about the

face and head, causing MH to sustain physical injuries including, but not limited to, a bloody nose.

(i) During the assault on MH, defendant MICHAL GUNAR shouted anti-Arab slurs. Specifically, defendant MICHAL GUNAR stated, in substance and in part, "Show me your faces you Arab mother fuckers."

(j) Defendant CHRISTOPHER ISING confronted RM in the Apartment Complex parking lot as RM attempted to provide assistance to MH.

(k) Brandishing a pair of brass knuckles, defendant CHRISTOPHER ISING physically assaulted RM by punching him in the head, causing RM to sustain physical injuries including, but not limited to, a puncture wound behind his left ear.

(l) Defendants MICHAL GUNAR and CHRISTOPHER ISING filed the Apartment Complex and returned to defendant CHRISTOPHER ISING'S East Brunswick residence.

(m) Defendant MICHAL GUNAR posted a photograph on an internet-based, social media website. The photograph depicted an individual wearing a pair of pants which appeared to be partially soiled with blood. Defendant MICHAL GUNAR posted a caption underneath the photograph which read, "Fuck niggers."

(n) On or about January 8, 2012, defendant MICHAL GUNAR engaged in correspondence with another individual on an internet-based, social media website. During that conversation,

defendant MICHAL GUNAR discussed his activities on the evening of December 31, 2011. Specifically, defendant MICHAL GUNAR stated, in substance and in part, "...we went to hunt down some sand niggers, it was me and my other bro on like 6 or eight and we whooped them..."

In violation of 18 U.S.C. § 371.

COUNT TWO

(Hate Crime and Aiding and Abetting)

1. Paragraphs 1, 3, and 4 of Count One of this Indictment are hereby realleged and incorporated by reference as though fully set forth herein.

2. From in or about December 2011, through on or about January 31, 2012, in Middlesex County, in the District of New Jersey and elsewhere, defendants

MICHAL GUNAR
and
CHRISTOPHER ISING

willfully caused bodily injury to a person, specifically MH and RM, who are of Egyptian descent, because of the person's actual and perceived race, color, and national origin.

In violation of 18 U.S.C. §§ 249(a)(1) and 2.

A TRUE BILL


PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 12-815(JAP)

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

MICHAL GUNAR
and
CHRISTOPHER ISING

INDICTMENT FOR

18 U.S.C. §§ 249, 371 and 2

A True Bill,

PAUL J. FISHMAN
UNITED STATES ATTORNEY
NEWARK, NEW JERSEY

DENNIS C. CARLETTA
ASSISTANT U. S. ATTORNEY
973-645-2767

USA-48AD 8
(Ed. 1/97)